

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY**

MICHAEL D. ROSE et al.,

Plaintiffs,

v.

**Civil Action No. 5:22-cv-00405
Honorable Frank W. Volk**

JEFF SANDY, et al.,

Defendants.

**EXPEDITED MOTION TO STAY CASE PENDING RULING ON MOTIONS TO
DISMISS**

NOW COME the Defendants, Wexford Health Sources, Inc., Daniel Conn, Elaine Gedman, John Froelich, Kennadi Miller, Ashley Stroup, Melissa Jeffrey, Helen Perkins, Jessica Miller, Mary Stone, Humayan Rashid, M.D., Brittani Marshall, and Taylor Brooks, by counsel, Bailey & Wyant, PLLC, Jordan K. Herrick, David E. Shumacher, and David L. Shuman, Jr., and for the reasons more fully stated in the contemporaneously filed Memorandum of Law, hereby move this Honorable Court to **STAY** discovery in this civil action pending resolution of the pending and soon to be filed Motions to Dismiss.

WHEREFORE, in light of the foregoing, Defendants Wexford Health Sources, Inc., Daniel Conn, Elaine Gedman, John Froelich, Kennadi Miller, Ashley Stroup, Melissa Jeffrey, Helen Perkins, Jessica Miller, Mary Stone, Humayan Rashid, M.D., Brittani Marshall, and Taylor Brooks pray that this Honorable Court **GRANT** this Motion and enter an **ORDER** staying discovery in this civil action pending a ruling on the Motions to Dismiss and further award the Defendants any and all other relief this Honorable Court deems just and proper.

WEXFORD HEALTH SOURCES, INC.,

**DANIEL CONN, ELAINE GEDMAN, JOHN
FROELICH, KENNADI MILLER, ASHLEY
STROUP, MELISSA JEFFREY, HELEN
PERKINS, JESSICA MILLER, MARY
STONE, HUMAYAN RASHID, BRITTANI
MARSHALL, and TAYLOR BROOKS,
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Defendants.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing **EXPEDITED MOTION TO STAY CASE PENDING RULING ON MOTIONS TO DISMISS** was served upon the following parties through the Court's Electronic Case Filing (ECF) system on this day, September 18, 2024:

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